

1776 K STREET NW
WASHINGTON, DC 20006
PHONE 202.719.7000

www.wileyrein.com

June 14, 2018

Joshua S. Turner
202.719.4807
JTurner@wileyrein.com

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *In the Matter of Accelerating Wireless Broadband Deployment
by Removing Barriers to Infrastructure Development*, WT Docket No. 17-79
*In the Matter of Comment Sought on Streamlining Deployment of Small Cell
Infrastructure by Improving Wireless Facilities Siting Policies; Mobilitie,
LLC Petition for Declaratory Ruling*, WT Docket No. 16-421

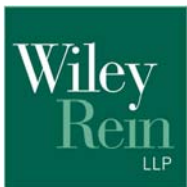
Dear Ms. Dortch:

On June 12, 2018, Ken Simon and Monica Gambino of Crown Castle, together with the undersigned and Ari Meltzer of Wiley Rein LLP, met with Commissioner Brendan Carr and his Chief of Staff, Jamie Susskind, to discuss issues raised in the above-referenced proceedings.

During this meeting, we focused on issues relating to ensuring timely access to the right-of-way for broadband facilities. In particular, we encouraged the Commission to ensure that any action focused on the deployment of small cells includes a definition of the term “small cell” that is broad enough to include without regard for whether the manufacturer may characterize the equipment as a single “antenna” due to the shared housing, the use of industry standard multiple in, multiple out (MIMO) and other multi-band equipment that allows for collocation of antennas for multiple bands and/or multiple carriers where the radome exceeds three cubic feet, as depicted in the attached slide, but the multiple antennas inside the radome are each less than three cubic feet.

We also addressed related issues, such as the applicability of Sections 253 and 332 to deployment in the public rights-of-way, how to implement deemed grant procedures, and approaches to limit unreasonable fees that impose an effective prohibition. Each of the positions advanced was consistent with Crown Castle’s prior written comments in these proceedings.

Pursuant to Section 1.1206(b)(2) of the Commission’s Rules, a copy of the written material provided in the meeting is attached hereto.



Marlene H. Dortch

June 14, 2018

Page 2

Sincerely,

/s/Joshua S. Turner/s/

cc: Commissioner Brendan Carr
Jamie Susskind

Volume drivers: Antennas

24" tall, 14.6" diameter
at the base
< 3 cu ft
Provides for MIMO &
colocation of AWS/PCS
frequencies and higher
If you need lower bands
you compromise
colocation and higher
band gain performance



48" tall, 14.5" diameter
< 6 cu ft
Allows for MIMO and colocation of all
bands without any compromise of gain
performance



Volume drive

Multiple Bands,
MIMO,
Colocation

700/850

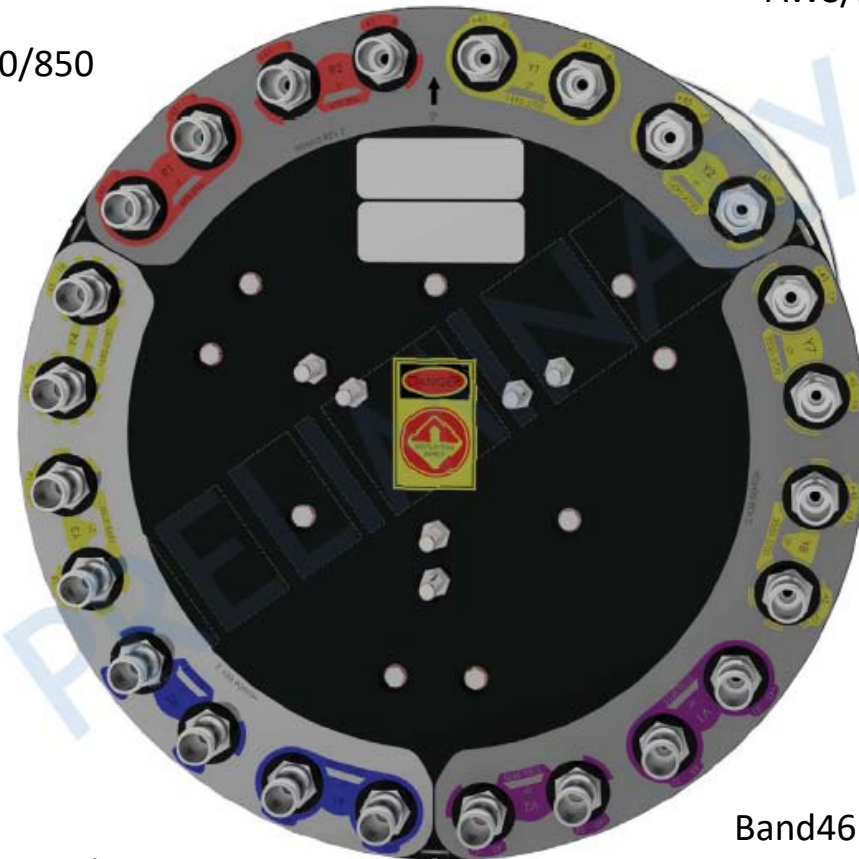
AWS/PCS/Band41

AWS/PCS/Band41

CBRS

Band46 LAA

AWS/PCS



- Requires < 6 cu ft of volume for maximum colocation